



GREATER NORWICH LOCAL PLAN

Stage C Regulation Draft Strategy and Site Allocations

Land at Briar Farm, Harleston (Site Reference GNLP2136)

Prepared by Strutt & Parker on behalf of M Scott Properties Limited

March 2020

Site Name:	Land at Briar Farm, Harleston (Site Reference GNLP2136)
Client Name:	M Scott Properties Limited
Type of Report:	Stage C Regulation Draft Strategy and Site Allocations
Prepared by:	Shannon Hubbard
Checked by:	Adam Davies
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Strutt & Parker, 66 – 68 Hills Road, Cambridge, Cambs. CB2 1LA
adam.davies@struttandparker.com
Tel No: 01223 459438

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Stage C Regulation 18 Draft Strategy and Site Allocations

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1. This document has been prepared by Strutt & Parker on behalf of M Scott Properties Ltd (Scott Properties) and is submitted in response to the Greater Norwich Local Plan Regulation 18 Stage C Consultation. It includes responses to the Draft Greater Norwich Local Plan – Part 1 The Strategy; Draft Local Plan – Part 2 Site Allocations; and the Greater Norwich Local Plan Interim Viability Study (November 2019) as part of the Evidence Base.
2. This response should be read in conjunction with our previous consultation submissions made in respect of Land at Briar Farm, Harleston (Site Reference: GNLP2136), which is proposed as a mixed use allocation in the Draft Local Plan – Part 2 Site Allocations document. The proposed allocation of this site is strongly welcomed on the basis that it is deliverable, suitable, and achievable and will bring much needed new housing, care, retail and recreational opportunities to Harleston.
3. Land at Briar Farm, Harleston comprises agricultural land to the east of Harleston, within the arc of the A143 bypass (forming the eastern boundary). It is made up of a number of agricultural fields and associated farm buildings and hard standings. The western boundaries of the site adjoin the existing residential development and new residential development sites allocated in the Joint Core Strategy (2011). The Fuller Road industrial estate lies to the south-west on the western side of Mendham Lane and the southern boundary adjoins existing allotments.

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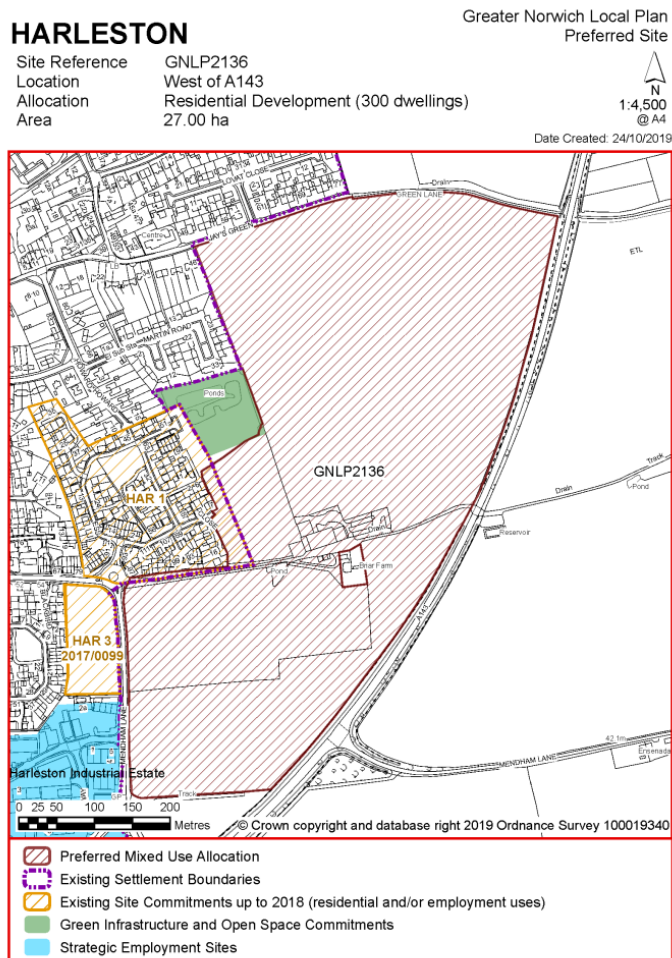


Figure 1: Greater Norwich Local Plan Preferred Site

4. As part of the ongoing engagement process, Scott Properties has had four meetings with Harleston Town Council that have been constructive.

Draft Greater Norwich Local Plan – Part 1 The Strategy

5. We have set out our response below to relevant questions from the Draft Greater Norwich Local Plan – Part 1 The Strategy as follows, having regard to the above site.

Question 6: Do you support or object to the vision and objectives for Greater Norwich?

6. The vision for the Local Plan is to achieve a *'vibrant, healthy, inclusive and growing communities supported by the delivery of new homes, infrastructure and an enhanced environment.'* It is clear from Section 3 – The Vision and Objectives for Greater Norwich that a key theme throughout is playing a part in the national commitments to achieving net zero greenhouse gas emissions by 2050.

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7. Scott Properties is passionate about the need to address Climate Change. It is agreed that this is one of the most important factors to our future and as such should be a key consideration in the preparation of the new Local Plan.
8. Chapter 14 of the National Planning Policy Framework (NPPF) focusses on 'Meeting the challenge of climate change, flooding and coastal change'.

"The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure."

(Paragraph 148 – NPPF, 2019)

9. The Plan needs to be visionary looking forward beyond 2038, in particular having regard to the Government's commitment to reach Net Zero Carbon by 2050. The Plan also needs to understand what the implications of Net Zero Carbon will be, and develop an appropriate strategy to ensure that this will be achievable within the Plan area.
10. We believe that our client's site can help address the visions and objectives for the Greater Norwich area, and we strongly support its inclusion in the draft Local Plan as a Site Allocation. The scheme currently proposed at Land at Briar Farm, Harleston could include approximately 20% single-storey dwellings suitable for older members of the community as well as those with or supporting someone with a disability, with associated site infrastructure and public open space forming part of a larger settlement extension of circa 330 dwellings, together with care, retail and recreational opportunities to serve the town.
11. It could deliver a proposed approximate mix of 5% 1 bed properties, 40% 2 bed properties, 40% 3 bed properties and 15% 4 bed properties, subject to further pre-application advice from Officers at South Norfolk District Council. The inclusion of circa 20% bungalows means as people age there is more choice and opportunity to plan for old age and move into more suitable accommodation when they no longer need a family home, while remaining in the local area and close to friends, family, and local support networks. New family housing also comes to the market as a result, reducing the pressure to provide additional family housing sites in the local area. This in turn enables new families to move to the area helping to redress the demographic imbalance and increase support for the continuance of demand for existing services and facilities.
12. The further inclusion of a site for a 90 bed C3 care block and additional specialist accommodation for older people (circa 30 units) as part of the care allocation will ensure that there is accommodation to meet the needs of an ageing population at a local level. Paragraph 34 of the spatial profile identifies that the population of Greater Norwich has a relatively high proportion of older people compared to national figures and that the pattern is set to increase to 2038. This further growth of the older population will add to the already significant pressure on home care services and will also feed through to increased demand for residential care facilities.

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13. The proposed development could also make a significant contribution towards affordable housing provision.
14. In addition, public open space will be provided for the enjoyment of both new and existing residents, and it will be possible to deliver an area of allotment space for both the enjoyment of existing and new residents in the area.

Question 9: Do you support, object, or have any comments relating to the approach to Housing set out in the Delivery Statement?

15. The Delivery Statement set out at Paragraph 139 of the Draft Strategy sets out that the Plan will promote a pro-active approach to delivery through only allocating housing sites where a reasonable prospect of delivery can be evidenced, taking into account policy requirements. This approach accords with paragraph 67 of the NPPF and is supported.
16. In terms of providing flexibility and including a 9% buffer, this accords with the objective of ensuring that a sufficient amount and variety of land can come forward. It is also recognised that it is proposed that the buffer will increase to 10% at the Regulation 19 stage, when the village clusters allocations will be included. It is acknowledged that the Plan aims to comply with the NPPF paragraph 68 requirement to accommodate at least 10% of housing requirement on sites no larger than 1 ha. However, given the uncertainty around the Carrow Works site (1,200) homes, it is recommended that where reasonable alternative sites exist in sustainable locations, additional smaller sites of up to c. 25 dwellings (expected delivery from 1 ha) should also be allocated throughout the Plan area to increase certainty around delivery and supply, particularly in the early parts of the Plan period, supporting the Government's objective of significantly boosting the supply of homes.

Question 11: Do you support, object, or have any comments relating to the approach to Infrastructure set out in the Delivery Statement?

17. Further to the above, the Delivery Statement states that it will continue to work to coordinate delivery with providers including Highways England and Anglian Water to ensure infrastructure will be delivered. The below approach outlined within the statement is also supported by my client.
 - On-site and off-site provision required of development through conditions or legal agreements;
 - Pooled use of CIL;
 - Maximising opportunities to access Government and other sources of funding;
 - Capital investment of public bodies and utilities companies; and
 - Locally led delivery vehicles.

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Question 12: Do you support, object, or have any comments relating to the Climate Change Statement?

18. As previously outlined within our response to Question 6, Scott Properties is passionate about the need to address Climate Change and as such supports the Climate Change Statement that has been included within the Draft Strategy at paragraph 141.

Question 13: Do you agree with the proposed Settlement Hierarchy and the proposed distribution of housing within the hierarchy?

19. The preferred option for the Local Plan combines the concentration of the majority of development in and around Norwich and on the Cambridge to Norwich Tech Corridor, a large focus on market towns, with an element of dispersal to villages. This approach is supported and provides a balance across a range of the objectives of the Local Plan.
20. This approach would see housing commitments providing a total minimum deliverable commitment of 6,342 within the Main Towns over Plan period of 2018 – 2038.
21. The settlement hierarchy's recognition of the contribution that the Main Towns like Harleston make to the delivery of housing is acknowledged and supported. While it is acknowledged that Norwich should be the principal focus growth, the market towns have an important role in creating a vibrant sub-region, and in the case of Harleston, serve wide hinterlands from which people are drawn to use the town's shops, services, and facilities, including both primary and secondary schooling.

Question 14: Do you support, object or wish to comment on the approach for housing numbers and delivery?

22. In developing the new Greater Norwich Local Plan, it will be important that an adequate mix of sites is promoted including a proportion of smaller sites as well as sites to meet specific housing needs (including housing for older people). Our client's site at Briar Farm, Harleston could make a meaningful and positive contribution towards meeting these goals.
23. With regard to the delivery of new housing, the Greater Norwich Local Plan's inclusion of a 9% buffer is supported, and while a higher buffer of up to 20% would normally be advisable to offset the potential for slow delivery on some sites, in particular large strategic sites. It is acknowledged that no allowance has been made in this instance for windfall within the overall supply and the contingency of approximately 2,000 homes provides additional flexibility to ensure that the overall housing needs are met. However, as outlined above, given the uncertainty around the Carrow Works site (1,200 homes), it would be advisable to allocate smaller sites up to c. 25 units (c. 1 ha) across the Plan area to help boost the supply of new homes.
24. It is acknowledged that the Plan aims to comply with paragraph 68 of the NPPF by accommodating at least 10% of the housing requirement on sites no larger than 1 ha, however, where there are reasonable alternatives available these should be included to maintain supply and avoid the need to rely on less certain strategic sites or large contingency sites.

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25. The “*presumption in favour of sustainable development*” is at the heart of the National Planning Policy Framework 2019 (NPPF). The Planning and Compulsory Purchase Act 2004 (Section 39(2)) establishes a legal requirement for Plans to be prepared with the objective of contributing to the achievement of sustainable development.
26. Paragraph 16 of the NPPF requires plans to be prepared positively in a way that is aspirational but deliverable. Paragraph 59 reminds Local Planning Authorities that the Government’s objective is to significantly boost the supply of homes and that it is therefore important that a sufficient amount and variety of land comes forward where it is needed.
27. To ensure that Local Authorities have specific deliverable sites they are required to maintain a 5 Year Housing Land Supply with an appropriate buffer. In addition, to ensure supply is maintained, they are also required to monitor the progress in building out sites, to comply with the housing delivery test. The Government’s recently published housing delivery figures for 2019 indicate delivery for the Greater Norwich area comprising Broadland, Norwich and South Norfolk to be at 140%. This is very encouraging, however, housing delivery can be fragile and susceptible to changes in the economy or delays in the delivery of key infrastructure necessary for strategic sites to come forward.
28. Further to the above, Policy 1 – The Sustainable Growth Strategy sets the settlement hierarchy for the Plan Area as follows:
 1. Norwich Urban Area (Norwich and Norwich Fringe)
 2. Main Towns
 3. Key Service Centres
 4. Village Clusters
29. Further detail on Village Clusters is provided at Appendix 5 of the Draft Strategy, as the preferred option the Council consider that a *‘cluster approach better reflects the way people access services in rural areas and enhances social sustainability by facilitating levels of growth in small villages’* This statement is supported, however it is unclear how this approach will work effectively within the Plan area and how achievable it will be. As such, a focus should be made on small and medium sites. The distribution of growth to a variety of sites will enable a steady delivery of homes and ensure the District can meet its housing targets throughout the Plan period.

Question 16: Do you support, object or wish to comment on the approach to Review and Five- Year Land Supply?

30. Policy 1: The Sustainable Growth Strategy states that the Plan will be reviewed 5 years after its adoption. At paragraph 33, the NPPF states that Local Plans should be “*reviewed to assess whether they need updating at least once every five years*” and goes on to state that reviews “*should be completed no later than five years after the adoption date of that plan*”. As such, it is not considered that Policy 1 is consistent with National Policy and this needs to be made more clear, stating that a review will be undertaken within five years of adoption or in the event housing delivery falls, or housing land supply falls below the annual requirement.

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31. In respect of the five-year land supply, as outlined at Policy 1 of the Draft Strategy, the Five-year housing land supply will be calculated across the whole of the three districts comprising Greater Norwich. This approach is supported, however, given the political nature of planning decisions it should be monitored to ensure that all three districts continue to deliver in a proportionate manner.

Question 17: Do you support, object or wish to comment on the approach to infrastructure?

32. Further to the response provided above in respect of Question 11, we support the approach to infrastructure that has been set out within Policy 1 – The Sustainable Growth Strategy in that the sustainable growth strategy will be supported by improvements to the transport system, green infrastructure and services. Adequate infrastructure provision is key to supporting the development of the Plan area and enabling development to come forward. The statement provided within Policy 1 is vague and needs a greater explanation as to how the Greater Norwich Local Plan will ensure sustainable growth is supported by improvements to infrastructure.

Question 18: Do you support, object or have any comments relating to the preferred approach to sustainable communities including the requirement for a sustainability statement?

33. The preferred approach to sustainable communities is the requirement for sustainability assessments to accompany planning applications for major developments. This approach is supported and is considered to be in line with the National Planning Policy Framework.

Question 25: Do you support, object or have any comments relating to the approach to on-site and local infrastructure, services and facilities?

34. Policy 4 – Strategic Infrastructure outlines the key elements to strategic infrastructure improvements that will be undertaken to support timely delivery of growth. The approach for on-site and local infrastructure, services and facilities is as follows:

'Development proposals will provide on-site services and facilities and support local infrastructure capacity improvements through on-site provision, providing land and developer contributions.'

35. This approach is supported by our client and as shown on the accompanying Masterplan for their site known as Land at Briar Farm, Harleston, this approach is being taken to ensure the site brings forward the required on-site services and facilities required.
36. There is scope within this part of Policy 4 to also address the need to provide community uses on larger schemes that will benefit both future and existing residents.

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Question 29: Do you support, object or have any comments relating to the approach to accessible and specialist Housing?

37. The Draft Strategy acknowledges at paragraph 245 that an increasing proportion of the population is over 65 or suffers from a disability which affects daily activities, increasing the demand for supported accommodation, including care accommodation. The Central Norfolk Strategic Housing Market Assessment 2017 identifies a growth of 3,909 people in care homes for the period 2015 to 2036. It points out that if these bed spaces are not provided, older people will not vacate dwellings and therefore the Local Plan will need to deliver a proportionate increase in housing numbers.
38. The Plan seeks to assist Norfolk County Council's aim to '*reduce residential care home and nursing home dependency and support people to remain more independent in their own homes or in supported housing*'.
39. This approach is supported in both National Policy and Planning Practice Guidance (PPG). In particular the 'Housing for Older and Disabled People' PPG, which requires Plan-makers to consider the diverse needs of older people, including those approaching retirement. The PPG also states that '*Plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people*' (Paragraph: 006 Reference ID: 63-006-20190626). The Draft Strategy's recognition of the need to provide suitable homes in the right locations is supported. A lack of availability of suitable accommodation forces people to move away from friends and family to find a property more suited to their needs, or, to make costly adaptations to their own homes.
40. In order to ensure an adequate provision of specialist housing, Scott Properties believes that Policy 5 – Homes should encourage a range of properties to suit a variety of needs, and specific allocations or requirements within site specific policies should be made for specialist housing, including care homes. Allocations such as Land at Briar Farm, Harleston which will provide opportunities for specialist housing and care facilities should be encouraged. This will ensure that a varied range of accommodation can come forward to meet the diverse needs of older people as set out in PPG and provide choice for those in later life, which can include:
 - Age-restricted general market housing;
 - Retirement living or sheltered housing;
 - Extra care housing or housing-with-care; and
 - Residential Care Homes
41. To ensure a variety of the housing, as identified within PPG above is delivered within Greater Norwich, the Plan should make specific allocations as opposed to just a generic housing mix policy that requires a diverse mix of housing. General housebuilders do not build specialist housing, and by providing housing that is deemed as suitable for older people that is also available to the general housing market does not address the varied and diverse needs of older people, or those with a disability.

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42. We would draw attention to the recent interim findings of the Inspector following the examination of the Suffolk Coastal Local Plan, which states:
- 'The Plan as submitted seeks to address the needs of older people through Policy SCLP5.8 Housing Mix. The Policy however, whilst supporting the provision of housing for older people, does not address clearly the significant need identified and would not be effective in delivering the market or affordable housing units for older people required. The Policy and supporting text should be amended to set out how the housing needs of older people will be addressed through the provision of housing and to boost the supply of this type of housing.'*
43. We would therefore encourage the Council to consider the merits of allocating specific sites for specialist accommodation within the Greater Norwich Local Plan. It is vitally important that suitable housing is provided to meet the needs of an ageing population.
44. The inclusion of a site for a 90 bed C3 care block will ensure that there is accommodation to meet the needs of an ageing population at a local level. Additional specialist accommodation for older people (circa 30 units) is also proposed as part of the area highlighted for "Care" use on the Masterplan. Furthermore, it is proposed that approximately 20% of the dwellings comprise single storey properties suitable for those older members of the community as well as those with or supporting someone with a disability are also proposed at Briar Farm, Harleston. These combined measures will enable people to downsize while remaining in the local area and close to friends, family, and local support networks. By providing this type of accommodation on an edge of town location, it allows people wishing to move to a property better suited to their current or future needs.
45. At present, the retirement housing market is dominated by a handful of providers who typically produce flatted developments within town centres for those approaching the later years of their lives (predominantly 75+ years of age). This results in a lack of choice and highly inflated prices for those aged 75+, who are looking to move to a property more suited to their current or future needs but also wish to remain close to friends and family. Needless to say, the couples and individuals who are of the 60-75 age bracket are left with no alternative housing option, other than making costly adaptations to their existing property.
46. Extensive research has shown a number of benefits arising from the provision of suitable specialist accommodation for the older population. The lack of suitable alternative and attractive accommodation acts as a significant barrier to down-sizing for the over 55s. Providing such accommodation will facilitate the release of under-occupied housing through downsizing. This will free up more housing in the locality for families, thus reducing the pressures on the local authority to make provisions for additional housing and costly adaptations to their existing housing stock.
47. The proposed development could make significant contribution to not only accessible and specialist housing but also much need affordable and market housing within the Greater Norwich area.

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Question 32: Do you support, object or have any comments relating to the approach to Self/Custom-Build?

48. The requirement for self/custom-build within Policy 5 – Homes of the Draft Strategy requires 5% of plots on residential proposals of over 40 dwellings to be serviced self/custom build plots unless a lack of a need can be demonstrated or plots have been marketed for 12 months and not sold. This approach is considered to represent too high a proportion and if implemented would deliver significantly more plots than there is currently demand for. Currently there are 113 people on the self and custom build register in the Greater Norwich Area (2018/19). This is not a significant number of plots to identify and if some of the reasonable alternative sites were reviewed, a range of smaller dedicated self and custom build sites could potentially be allocated across the Plan area. These sites could also contribute to site allocations of less than 1 ha, which would equate to the need to find approximately six sites to meet the demand on the current register rather than requiring inclusion on larger sites.
49. Furthermore, self/custom-build units are considered slower to deliver on larger sites when they are expected to be brought forward alongside mainstream construction. If specific sites were allocated, construction activities could be managed phased without conflicting with mainstream construction which would demonstrably deliver new homes at a much faster rate than can be achieved through the self and custom build route. As such, it would be our recommendation that the requirement for such plots should be based on a locally identified need or demand rather than blanket approach of 5% across the Plan area with the identification of specific self and custom build site allocations.

Question 41: Do you support or object or wish to comment on the approach for the main towns overall? Please identify particular issues.

50. Policy 7.2 – The Main Towns outlines that the settlements in the Plan area of Aylsham, Diss (with part of Roydon), Harleston, Long Stratton and Wymondham will provide for substantial development of around 6,300 homes. We support this approach although given the dispersed nature of the settlements consider that a more ambitious level of growth would be deliverable and would provide greater support to enable these rural communities to prosper and thrive. Such an approach would provide the Plan with a greater degree of flexibility in the event the larger allocations in the Norwich fringe deliver more slowly than anticipated.
51. The Main Towns are sustainable locations that are suitable to accommodate additional growth to contribute to the overall Plan area's housing need. This approach is supported by paragraph 72 of the NPPF which identifies that the supply of a large number of new homes can often best be achieved through planning for larger scale development, including extensions to existing villages and towns, where they are well located and supported by the necessary infrastructure and facilities.

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Question 42: Do you support or object or wish to comment on the approach for specific towns (Aylsham, Diss (with part of Roydon), Harleston, Long Stratton and Wymondham). Please identify particular issues.

52. In respect of Aylsham, Diss and Harleston, these settlements are more dispersed lying on the peripheries of the Local Plan area and support wider rural communities in adjoining districts. They have been identified for lower levels of growth than Long Stratton and Wymondham. As such we strongly support the proposed allocations in these towns which will help these rural communities to prosper and thrive. To this extent, in addition to the preferred allocations, we recommend that further consideration should be given to those sites identified as reasonable alternative allocations to further boost housing supply and support a prosperous rural economy. In particular, we strongly support the proposed allocation of sites such as the land at Briar Farm, Harleston (GNLP2136) which are included as preferred options and provide for positive growth in relation to the settlement hierarchy, infrastructure and local constraints. In respect of our clients site, Land at Briar Farm, Harleston it will not only provide much needed housing, but also specialist homes C3 care accommodation, along with a retail area, and extensive open space and recreational facilities. The site is available now and developable, it can come forward and start to deliver significant numbers of new homes in the first five years of the Plan period and because of the mix of residential units there will be a wider range of market demand so that delivery is not restricted due to concerns about market saturation.
53. In summary, the site is immediately available for development and delivery could be completed within a short term period.

Question 48: Do you support or object or wish to comment on any other aspect of the draft plan not covered in other questions? This includes the appendices below and the evidence base on the web site. Please identify particular issues.

54. In response to Question 48, the below comments have been made in respect of the **Greater Norwich Local Plan Interim Viability Study (November 2019)** We are generally supportive to the approach taken but have some observations in respect of the detail which we hope are helpful:

Density (Table 4)

- Net areas are only used on Typologies 6-9, but are also applicable to Typology 4, where sites will also be required to provide on-site public open space, green infrastructure and SUDS, as well as often needing to 'gift' land for community uses.
- The density figures are presumably based on the indicative mixes in Table 5, but these do not have any allowance for housing for older people (single-storey), which will again reduce density. This will mean that the proposed density of 25 dwelling per hectare (gross) will be difficult to achieve where large proportions of bungalows are to be included.
- The net: gross ratios are likely to be circa 66% on these sites, meaning a net density of circa 38 dph will be needed.

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Housing Mix (Table 5)

- As mentioned above, there is nothing for single-storey accommodation, for example housing for older people and accessible housing, despite the strong demographic arguments which demonstrate the need to provide accommodation for an ageing population.
- While housing need may suggest the proportion of 3 bedroom homes should be high in the Main Towns, demand for market properties is likely to be higher for larger family properties. Such a high percentage of two bed houses seems high at the expense of 3 and 4+ bed family housing in the Main Towns. In particular 8% of 4+ seems very low. Market demand is likely to be circa 20% of the private dwellings with 4+ bedrooms (13% aggregated).
- The 20% for flats also seems high, the market for private flats is limited in rural locations, so we would expect this to be closer to 10% overall.

Size of Dwellings (Table 6)

- Again no information has been provided for single-storey properties.
- The 3-bedroom house size (102 sq. m) is for a 6-person property, so comes out large at 1,100 sq. ft.

Affordable Housing (Table 7 & Table 15)

- Typology 4 (Main Town) is assessed at 28% Affordable Housing but 33% is sought by policy.
- At 28% (and with current assumptions) it is the 2nd least viable (£115,872 surplus) and as such, on the Sensitivity Testing it fails across all scenarios.
- Affordable Rent – 60% is very ambitious as a return, it is recognised in the report that the range is 45% to 65%, so 50% would be a better assumption to use.
- Affordable Ownership – again it is recognised that the range can be 60% to 80%, so 70% would be a better assumption than 75%.
- As mentioned in the caveats, no account has been taken of the 5% custom build policy requirement.

Access

- For specialist housing developments, all (not just 20%) of homes will meet at least the M4(2) access requirement, which adds up at £940 per dwelling. It is our consideration that a new house type is required for the Study.

RAMS

- A justification is required in relation to the recommendation for £200 per dwelling. This was recently revised down to £122 in neighbouring Suffolk.

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Market Revenue

- The values do not correlate with what is currently on the market, especially for the 4 bedroom properties, for which the values are overstated by as much as 33%. The below tables show all of the new build (estate) houses on Rightmove as of the 18th February 2020.

Type	Location (Harleston)	Price	Benchmark
4b detached	Fuller's Place	£375,000	£360,000 - £385,000
4b detached	Fuller's Place	£375,000	
4b semi	Fuller's Place	£315,000	
4b semi	Fuller's Place	£315,000	
4b semi	Fuller's Place	£299,995	
4b semi	Fuller's Place	£299,995	
4b end terrace	Fuller's Place	£299,995	
4b terrace	Fuller's Place	£289,995	

Build Costs

- The costs for Bungalows will be higher than £1,221 per square metre and it is suggested that consideration of bungalows is included within the Study.
- The costs for Garages have been contained within the site and infrastructure costs. CIL will also be payable on the garages which will increase the cost.
- No allowance is made for ground conditions / ground water protection / flood risk. It is important that these are factored in.

Sites and Infrastructure Costs (Table 10)

- 15% seems low for site and infrastructure costs, it is considered that these costs will rise over the Plan period with increased electricity requirements etc.

CIL/S106 (Table 11)

- As mentioned above, Garages have been excluded but will be chargeable.
- For Typology 4 – the majority of the Main Towns are in Zone B so it would make sense to use the appropriate figure.
- The 2020 figures are now available and as such should be used (£70.46 per sq. metre).
- No allowance has been made for site-specific Section 106 works such as Public Rights of Way improvements etc.

Benchmark Land Value (Table 12a)

- The figure for Typology 4 is £432,432 / ha = £175k / acre (gross). This does not reflect that most land is purchased at a discount to reflect the planning and promotion risks / cost time. It also doesn't consider sales agent and legal fees.

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- Taking the example in the report shown below, the figure should be revised accordingly and checked against actual transactions to show that the transaction levels (and therefore expectations) are still far higher at circa £300,000 gross per acre.
- 7.5 acres @ £175k per acre = £1.312m
 - minus Agent's Fees @ 1.5% = £1.292m
 - minus Sales Legal Fees @ £10k = £1.282m
 - minus Recoverable Promotion Costs @ £150k = £1.132m
 - minus Promoter's Share @ 20% = £906k
 - = £121k per acre (= EUV x 12, not 17.5)

Greater Norwich Local Plan – Part 2 Site Allocations

55. Below is set out our response to relevant questions from the Draft Local Plan – Part 2 Site Allocations. This sets the preferred allocations and the respective draft policies for the new housing and employment sites proposed to be allocated for development to help implement the Draft Greater Norwich Local Plan strategy.

Policy GNLP2136 Land at Briar Farm, Harleston

56. We strongly support the inclusion of our client's site, at Briar Farm, Harleston, which has been included within the Draft Greater Norwich Local Plan Sites document as a preferred option under site reference GNLP2136. It is one of two new sites identified to provide Harleston with an additional 450 new homes and is the only preferred mixed use allocation within the settlement.
57. The site comprises 27 hectares to the west of the A143. Policy GNLP2136 states that the site is '*likely to accommodate at least 300 homes, 33% of which will be affordable as well as care, employment, retail, open space and community facilities.*' However, we consider that the site can deliver significantly more than 300 dwellings and care can be quantified.
58. A series of updated plans and supporting information including a site Masterplan has been provided with this consultation response. The Masterplan shows how the development proposals for the site have evolved in response to engagement with the Town Council and technical work since the submission of the earlier representations. The Masterplan shows how 330 dwellings could be delivered. It identifies a site of 2.5 ha for a 90 bed (Use Class C3) care block with circa 30 older persons housing units alongside. This would all be integrated with extensive areas of open space and landscaping along with 1.6 ha for community use and 0.9 ha potentially for allotments. While the policy suggests the mix of uses should include employment use, demand for employment space locally is limited and therefore the Masterplan has set aside an area of 0.8 ha for a potential retail use.
59. The policy wording for Policy GNLP2136 is outlined below:

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POLICY GNL2136 Land at Briar Farm, Harleston 27.00 ha is allocated for mixed-use development. The site is likely to accommodate at least 300 homes, 33% of which will be affordable as well as care, employment, retail, open space and community facilities.

More homes may be accommodated, subject to an acceptable design and layout being achieved and any infrastructure constraints addressed.

The development will be expected to address the following specific matters:

- *Masterplan to identify the mix of uses on the site and the relationship between them, to be accompanied by a phasing and infrastructure plan;*
- *Access (vehicular and pedestrian) to be via Mendham Lane with further pedestrian and cycle access from Barley Close;*
- *A new footpath connection to the existing Public Right of Way to the north of the site, creating a new link to the proposed open space to Angles Way;*
- *Submission of a Transport Assessment;*
- *Safeguarding of existing Public Right of Way east of Mendham Lane;*
- *Design and layout to take account of the existing residential and employment development to the west, northwest and north of the site, to protect the amenity of existing and future residents;*
- *Layout and landscaping to take account of the River Valley location and the potential to mitigate noise from the adjacent A143;*
- *Contribution towards green infrastructure protection or enhancement along the Waveney valley corridor;*
- *Appropriate investigation works and mitigation measures to address the surface water flooding to the north east of the site will be required;*
- *A proportionate contribution towards a new public water supply to help meet the requirements of the development.*

Notes

GNL2136: This site is preferred for allocation as it is well located in terms of the form and character of Harleston. The design of the development will need to overcome constraints including surface water flow path through the site, and the need for a sensitive approach to the river valley landscape. Development would require submission of a transport assessment and mitigation of any highway concerns.

60. Scott properties strongly supports the above policy however would recommend that the policy wording is amended to acknowledge the low demand for employment land locally. It is therefore suggested that the second sentence of the in introduction to the policy is amended to the following:

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The site is likely to accommodate at least 330 homes, 33% of which will be affordable. The mix of uses is likely to include a 90 bed care unit, approximately 30 older persons housing units, 0.8 ha of retail or employment land, public open space and land for community use.

61. In response to the specific matters to be addressed in the draft policy, a Masterplan has been provided for the site, and the latest version of this has been included within this consultation response. Furthermore, it is anticipated that the residential element of the site will be delivered as a single phase, rather than through a phased development and as such, the need for a Phasing Plan is not considered to be necessary at this stage.
62. Detailed design of the proposed access to both Mendham Lane and Harvest Way (Barley Close) have been shown on the accompanying Masterplan and the accompanying highways drawings, and a new footpath has also been shown on the footpath links plan as requested by the policy. The safeguarding of the existing Public Right of Way is also clearly shown and provides a key pedestrian/cycleway with a reconfiguration to the existing vehicular access from Briar Farmhouse.
63. The Masterplan demonstrates that careful consideration has been taken to respect the surrounding residential development by providing attenuation and single-storey dwellings (bungalows) to the west and north of the site to reduce visual impact and harm on residential amenity. Furthermore, a large open space buffer has been provided to the east of the site, taking into consideration the landscape visual impact the development of the site may have on the River Waveney valley. A Noise Survey has also been carried out to confirm that noise from the A143 is not a constraint to development.
64. A draft Drainage Strategy has been prepared to address surface water flooding to the north-east of the site, which will include attenuation basins located and sized accordingly to provide appropriate mitigation. The client is also in the process of engaging with Anglian Water in respect of a new public water supply to help meet the requirements of the development and is confident this can be addressed at the planning application stage.
65. It is considered that the site would help maximise delivery in line with the recommendations of the Independent Review of Build Out, Final Report (Letwin Review) October 2018, delivering a more diverse range of product and thereby facilitating greater market absorption. The site can be brought forward through the submission of either an outline application with an Indicative Masterplan or as a detailed application on a subject to planning basis. Initial discussions have taken place with private housebuilders who have expressed an interest, and more detailed dialogue is ongoing with Saffron Housing regarding the proposed care accommodation. An updated planning and delivery strategy will be agreed following pre-application advice and public consultation.
66. Scott Properties are confident that respective development partners for the family housing, bungalows and care facilities can jointly bring forward reserved matters applications within two years or less of outline consent being obtained. A significant amount of technical work has already been undertaken which has confirmed there are no physical constraints to development. Scott Properties intends to submit a pre-application advice request in April 2020. The proposals will be amended as required by the pre-application advice and then taken forward for wider public and community

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consultation. This will centre around a public consultation event planned for Summer 2020 followed by an online and postal feedback exercise.

67. Assuming that a planning application is submitted following the Regulation 19 consultation in 2021, it is reasonable to expect that planning permission could be forthcoming before the end of 2021 allowing contractual arrangements to be completed with development partners before the end of the year (if not already concluded). Respective reserve matters applications could then be prepared and submitted in the early part of 2022 meaning that development on site could commence in 2022 via either route. Based on this assessment, it is anticipated that the first houses could be available for occupation in spring 2024. Assuming completions of 15 bungalows and 50 family houses per year, as set out in the table below the site could be completed in 2029.

	2024	2025	2026	2027	2028	2029
Bungalows	15	15	15	15	6	
Family Housing	50	50	50	50	50	14

68. Furthermore, as the site is in a single ownership, it is more achievable as there are no complex land ownerships or legal issues to compromise its ability to come forward for development. It is available now and would represent a realistic and deliverable development in the current market conditions. We further support the inclusion of the site within the Local Plan as it is located adjacent to the settlement boundary and as such would represent a logical expansion to the town. Our professional judgement is that this site could come forward with a viable residential housing scheme that is policy compliant.
69. As outlined within the National Planning Policy Framework 2019, to be considered 'deliverable', sites for housing should be *'available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years.'* In summary, we consider that the site is suitable for residential development, available within the next 5 years and achievable due to being in one ownership.
70. All this information confirms that the site is deliverable, suitable, and achievable and will bring much needed new housing, care, retail and recreational opportunities to Harleston.

Technical Work completed to date

71. The following additional technical work has been completed since the previous Reg 18 Consultation and our submission in December 2018, and the documents are included as appendices to this document.
- a. Masterplanning
 - i. Proving Layout
 - ii. Parameter Plan
 - iii. Pedestrian Access Plan
 - b. Highways and Utilities
 - i. Highways Technical Note
 - ii. Vehicular Access Proposals

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- iii. Barley Close Pedestrian Link
- iv. Utilities Assessment

- c. Flood
 - i. Flood Risk Technical Note
 - ii. Infiltration Testing
 - iii. Preliminary Surface Water Attenuation Calculations

- d. Ecology
 - i. Bat Scoping and Activity Survey
 - ii. Great Crested Newt and Amphibian Survey
 - iii. Reptile Survey
 - iv. Arboricultural Survey

- e. Landscape and Heritage
 - i. Archaeological and Heritage Assessment

- f. Environment
 - i. Noise Assessment